HAZARDOUS WASTE MANAGEMENT PLAN SAN DIEGO METRO AREA



NAVY REGION SOUTHWEST HAZARDOUS WASTE PROGRAM

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INTRODUCTION

The Chief of Naval Operations (CNO) has defined the Navy's Environmental Programs vision to be a Navy that is recognized for its leadership and excellence in environmental protection, pollution prevention and compliance while effectively executing support to fleet requirements, naval operations and national defense. CNRSW Hazardous Waste Program is committed to provide environmental support, resources and technical guidance in a manner that emphasizes the protection of the environment and compliance with hazardous waste laws that optimizes the operational readiness of shore commands and fleet support functions. To accomplish this mission and CNO's vision, CNRSW Hazardous Waste Program Office will provide a personal commitment, resource management and technical knowledge in order to strive for environmental excellence for the protection of the environment and support to ashore and fleet communities.

Environmental laws and regulations have increased exponentially in recent years. Specific to hazardous waste requirements, CNRSW (metro area) is regulated by the California Department of Toxic Substance Control (DTSC) and Certified Unified Program Agency (CUPA), San Diego Department of Environmental Health, along with the U.S. Environmental Protection Agency (USEPA) each having their own specific environmental requirements that regulate hazardous waste. These state and local regulatory agencies have more stringent environmental requirements and policies than those established by the USEPA. To identify and comply with these more stringent requirements specialized knowledge and expertise are required. CNRSW Hazardous Waste Program Office through the information provided within this Hazardous Waste Management Plan will help your command understand your responsibilities towards environmental compliance for hazardous waste management.

Compliance with these environmental requirements is the responsibility Navy commands must accept, not only as a good environmental steward but also in the role of environmental leadership in the Southwest Region. Non-compliance with environmental requirements may be far more costly in the long run, not only in dollars, but also as negative publicity that can effect relations within the community and impact future naval operations.

HAZARDOUS WASTE MANAGEMENT PLAN ADMINISTRATION

1-1 PURPOSE

- a. To provide CNRSW commands and activities military and civilian personnel in the metro area with a reference document to support overall hazardous waste management by defining their responsibilities "as generators of hazardous waste" relating to hazardous materials/waste accumulation, storage, record keeping, training and disposal issues. Additionally, to establish an effective and comprehensive waste management program for hazardous waste compliance for all areas under the cognizance of the Commanding Officer.
- b. The requirements specified within this plan only reflect the provisions for non-explosive hazardous waste. Explosive hazardous waste requirements are identified in the Regional Explosive Hazardous Waste Management Plan (or local plan) located at each installation's environmental office.

1-2 COMMANDS RESPONSIBILITIES

- a. Commands and activities whose operations or processes generate hazardous waste and or maintain less than 90-day hazardous waste storage or operate satellite accumulation areas must comply with all Federal, State and local hazardous waste laws or regulations.
- 1. Become familiar with any environmental permits and their provisions that may apply to the commands operations or processes and recognize the responsibilities of a hazardous waste generator relating to the "cradle to grave" waste disposal requirements.
- 2. Appoint in writing the personnel that are to be designated as the command, work center or shop Hazardous Waste Coordinator or Handler that will manage all applicable hazardous waste requirements. (These may be collateral duty positions, but their tasking must be prioritized to allow them to serve as a point of contact in matters regarding hazardous waste issues).
- 3. Ensure all command personnel assigned to hazardous waste operations complete a program of classroom instruction or on-the- job training as identified in Section 3-5 within 6 months after being assigned their duties. This training must include annual refresher training and ensure that the training provided specifically reflects the duties and responsibilities being performed by the individual.
- 4. Maintain at each generator location, records for hazardous waste turn-in, waste profile sheets, laboratory analysis, copies of manifests or any other information relating to hazardous waste determination or disposal.

- 5. Maintain at each generator location copies of environmental training records, designation letters and waste handler certificates for personnel currently and previously involved in hazardous waste operations. These records shall also include the business plan training rosters or any other documented hazardous waste training provided to work center or shop personnel.
- 6. Notify the Federal Fire Department @ **9-911** for *ALL* spills of hazardous material/waste that meet the following criteria:
 - (i). Any spilled substance that is greater than 5 gallons in total volume.
 - (ii). Spilled substance(s) that enters a storm drain, sewer system or body of water (bay).
 - (iii). The spill is not easily contained and/or requires outside assistance to clean up.
 - (iv). Spills that threaten human health, safety and/or the environment or that is from an unknown substance.
- 7. Coordinate with the Regional Environmental Department and Navy On-Scene Coordinator (NOSC) immediately after a spill or release to provide all necessary clean-up, disposal and or reporting information to ensure proper compliance with applicable hazardous waste laws and regulations.

1-3 CNRSW RESPONSIBILITIES

- a. Navy Region Southwest Hazardous Waste Programs and Policies Division shall research, develop and disseminate regional hazardous waste policies and guidance, request funding from higher echelon commands, serve as the primary point of contact to regulatory agencies and provide oversight for the overall management of hazardous waste. This includes, but not limited to:
- 1. Advise commands/activities on changing environmental laws, regulations or other requirements that will effect or potentially adversely impact command specific hazardous waste operations or processes.
- 2. Provide resources to regionalized commands/activities for approved special projects or emergent requirements, hazardous waste disposal, storage area permits, hazardous waste analysis and hazardous waste generation fees.
- 3. Complete and submit applications for hazardous waste accumulation area site permits, permit modifications or site closures to the CUPA or other authorized regulatory agency.
- 4. Complete and submit hazardous materials business plans, including plan or site map modifications or site closures to the CUPA or other authorized regulatory agency.
- 5. Develop and disseminate to regional commands/activities the following management plans or similar guidance documents: Hazardous Waste, Pesticide, PCB and Tiered Permitting.

- 6. Provide an ombudsman to address base specific questions or concerns on hazardous waste management, regional policy or guidance, permitting or other issues relating hazardous waste operations.
- 7. Coordinate, compile and submit information for required environmental reports or data calls such as EPCRA, P2ADS and PCBs to the appropriate regulatory agencies or naval activities.

1-4 CNRSW HAZARDOUS WASTE OPERATIONS

- a. Facilities Engineering Center (FEC) manages a contract for proper transportation, storage and disposal of hazardous waste within the metro-region. This contract includes the operation of several authorized government-owned hazardous waste storage facilities, an EPA approved analytical laboratory, industrial and oily waste treatment plants, and BOWTS. The current FEC contract is with Shaw Infrastructure, Inc (commenced on 1 April 2005).
- b. To the maximum extent feasible, all hazardous waste should be disposed of through the government-owned hazardous waste facilities. Hazardous waste turn-in procedures are identified in Section 3-10.
- c. Any customer services issues that arise associated with analysis/transportation/storage/treatment/disposal of hazardous waste should be addressed directly to the appropriate FEC Subject Matter Experts (SME). See Appendix 6 for contacts and phone numbers.

REGULATORY AUTHORITY

- 2-1 In order for the Navy to accomplish its mission of being a responsible environmental steward, command or activity military and civilian personnel must be aware of the environmental laws and regulations which pertain to their specific process or operation that generate, store, treat or dispose of hazardous or toxic wastes. These requirements have been established and mandated by Federal, State or local law and are not discretionary. Cited below are the Federal environmental laws that outline the major components of overall hazardous waste management.
- **2-2** RESOURCE, CONSERVATION, AND RECOVERY ACT (RCRA) 40 CFR 260 279 addresses "cradle to grave" hazardous waste management, establishes the duties and responsibilities of hazardous waste generators regarding the storage, treatment and disposal of hazardous waste, and authorizes the EPA to issue corrective actions clean-up orders for hazardous waste releases.
- **2-3** EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT (EPCRA) 40 CFR 370, 372 & 373 focuses on hazards associated with toxic chemical usage and release data, requires immediate notification of releases of oil and hazardous substances and CERCLA defined "reportable quantities" (RQ) to State and local emergency response organizations and planners.
- 2-4 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) 40 CFR 300 355 empowers EPA to identify and prioritize hazardous waste sites for clean-up or remediation. Imposes strict liability for environmental clean-up on persons whose actions caused the release into the environment, and mandates reporting to the National Response Center on hazardous substances or chemical releases exceeding the reportable quantity limitations.
- **2-5 FEDERAL FACILITIES COMPLIANCE ACT** expands the enforcement authority of Federal, State and local regulators with respect to hazardous waste management at federal facilities. Requires the payment of fees or service charges assessed in connection with hazardous waste regulatory inspection programs and waives immunity, allowing regulatory agencies to issue fines and penalties for violations.

HAZARDOUS WASTE MANAGEMENT

3-1 WASTE DETERMINATION

- a. Once hazardous material is discarded, abandoned, released into the environment or is no longer useable for its intended purpose it becomes classified as a waste based on the properties of the material or any associated hazard obtained during the process or usage. Hazardous waste is defined as any hazardous material or substance or its residue that is spent, off-specification, expired, retrograde or non-recyclable. That due to the materials or substances concentration, toxicity, physical or chemical characteristics meet or exceed the threshold limitation levels identified in environmental laws, or may cause or significantly contribute to death, serious irreversible illness or pose a substantial present or potential hazard to human health or the environment.
- b. The generator must determine either by laboratory analysis or user (generator) knowledge that a used or expired substance or material is to be managed as a hazardous waste. Once the hazardous waste determination and characterization (type of waste) have been made, the generator must properly treat, store, recycle or dispose of the waste in accordance with all applicable environmental laws and regulations.
- c. Hazardous wastes are identified and classified under two different and distinct sets of standards, which includes test methods, regulated substances or waste and hazardous concentrations. The first standard is the Resource, Conservation and Recovery Act (RCRA). RCRA is the Federal or EPA standard for managing hazardous waste. All states and U.S. Territories must comply with these requirements. Second is non-RCRA. Non-RCRA is the California standard for the identification, classification and management of hazardous waste that are not regulated by the USEPA under RCRA. All hazardous waste generators in California must comply with both RCRA and non RCRA hazardous waste requirements.
- d. Hazardous waste may be treated, recycled or stored at the generator location, disposal can only occur at a permitted disposal facility. (Prior to implementing any new recycling or treatment processes or storage location contact the Regional Environmental Department at 524-6351 or base environmental office at your respected base).

3-2 HAZARDOUS WASTE CHARACTERISTICS

- a. A waste becomes classified as a RCRA or non-RCRA hazardous waste when the characteristic or hazardous property of the waste meets or exceeds the regulatory limits set for ignitability (flash-point), corrosivity (pH), reactivity or toxicity, (heavy metals or bioaccumlative substances)
- b. Hazardous wastes are identified, classified and segregated by characteristics or hazardous class. Although most wastes have only a single characteristic, some wastes exhibit multiple hazards, in being both ignitable and reactive or toxic and corrosive.

It is important to know what the waste characteristic or hazards are when handling, selecting containers, placing the waste into storage or selecting a location for your accumulation area. The following standards apply to both RCRA and non-RCRA hazardous wastes, except when specified otherwise.

- (1) <u>Ignitability:</u> (D001) Hazardous wastes or materials exhibit the characteristic of ignitability or flammability when the substance:
 - (i) Is a liquid that is not aqueous (water based) and has a flash point of less than or equal to 140 degrees Fahrenheit. Or,
 - (ii) Is non-liquid and is capable under standard temperature and pressure to cause ignition through friction, absorption or spontaneous combustion. Or,
 - (iii) Is an ignitable compressed gas. Or
 - (iv) Is classified as an oxidizer.
- (2) <u>Corrosivity</u>: (D002) Hazardous waste or materials exhibits the characteristic of corrosivity when the substance:
 - (i) Is an aqueous substance and has a pH of less than 2 or greater than 12.5. Or,
 - (ii) Is liquid that corrodes steel at a rate greater than ¼ inch per year. Or,
 - (iii) Is a solid that when mixed with equal parts of water, produces a solution with a pH of less than 2 or greater than 12.5. Or,
 - (iv) Is not a liquid and when mixed with equal parts of water, produces a solution that corrodes steel at a rate greater than ¼ inch per year.
- (3) <u>Reactivity:</u> (D003) Hazardous waste or materials exhibit the characteristic of reactivity when the substance:
 - (i) Reacts violently with air, water or another substance. Or,
 - (ii) Forms potentially explosive mixtures when mixed with water. Or,
 - (iii) When mixed with water produces toxic gases, vapor or fumes. Or,
 - (iv) Is capable of detonation or explosive reaction when subjected to an ignition source, in heated confinement or under normal temperature and pressure.
- (4) <u>Toxicity:</u> (D004-D043) Hazardous waste or materials exhibit the characteristic of toxicity when the substance:

- (i) Meets or exceeds the standards in parts-per-million for heavy metals, inorganics, organics or bioaccumulative substances, such as mercury & lead specified in Federal (RCRA) and State (Non-RCRA) regulations. Or,
- (ii) Fails the acute aquatic 96 hour bioassay for LC 50. (California only)
- (iii) When released, discarded or disposed of, poses a significant or potential threat to human health or the environment.

3-3 HAZARDOUS WASTE ACCUMULATION AREAS

a. Hazardous waste may be accumulated at the generator location for up to 90 days or 1 year at a satellite accumulation area.

3-3.1 90-DAY ACCUMULATION AREAS

- a. Impervious Base: The foundation of the waste accumulation areas should be impervious to spills or leaking waste, constructed of concrete, plastic or metal and be compatible with the waste being stored, with all cracks or gaps repaired or sealed.
- b. Containment Capacity: A containment system should be incorporated and designed to have the capability of containing the contents of the largest container of liquid waste plus 10% to prevent the release of hazardous waste or constituents into the environment.
- c. Drains: Storm or floor drains adjacent to or drainage valves located within the accumulation area should be covered, closed or sealed to avoid any possible release of waste, or contaminated rain water into the storm drains, sewer system or surrounding environment. Also identify where these drains will discharge in the event there is a release.
- d. Aisle Space: Adequate aisle space (2 feet minimum) shall be maintained between rows of pallets or containers to allow for inspections, container identification or spill clean up.
- e. Inspections: Personnel managing a 90-day waste accumulation area must conduct and document inspections of their facility at least weekly. Any hazardous waste storage tanks under their control must have documented daily inspection records. Identifying the tank and piping conditions, secondary containment or leaking substances. Leaking tanks or piping or containers must be repaired, replaced or overpacked immediately upon discovery.
 - (1) "Weekly Inspection" according to the CUPA, (the regulatory agency that conducts hazardous waste inspections), a weekly inspection is an inspection that is conducted at some point once every calendar week or about every 7 days.
 - (2) "Daily Inspection" means each "operating day". An operating day has been determined to be any day that personnel are in the work place conducting operations or actually doing work. Even though these operations may not involve the generation of hazardous waste or using the hazardous waste tank or tank system, inspections must still be conducted that day.

- f. Waste Segregation: Do not place ignitables, oxidizers, and corrosive wastes on the same pallet or storage bay without a separation device. These wastes must be separated to avoid chemical or physical reactions if they become mixed. If possible separate waste by hazard class, meaning; wastes that pose the same type of hazard. Ignitable and reactive wastes must be stored at least 50 feet from the base property line.
- g. Security: Waste storage areas must be controlled, with limited access to unauthorized personnel, warning signs should be posted identifying that location as a hazardous waste storage area.
- h. Housekeeping: Spills, leaking containers/tanks, piping systems or puddles on top of drums must be contained and cleaned-up immediately, all trash, absorbent materials or other debris must be collected and disposed of properly.

3-3.2 CONTAINERS/TANKS

- a. Labels: Hazardous wastes labels must be placed on containers or tanks as soon as the <u>first drop</u> of hazardous waste is placed inside. Ensure each section of the label is properly and completely filled out with a water-resistant marker.
- b. Storage Time: Monitor the accumulation start date, hazardous waste must not exceed the 90-day storage limit unless they meet the requirements of a satellite accumulation area (Section 3-4) or meet other specific storage duration requirements.
- c. Markings/Stenciling: Ensure all piping associated with hazardous waste storage tanks (above and below ground) or other piping systems associated with waste transfers are properly identified.
- d. Closed Containers: All containers or tanks must be closed unless waste is being added or removed. Ensure the containers have proper fitting and tightly secured lids, rings or bungs. Screw type funnels may be left attached if it has a one way check or ball valves or another type of securing cover to prevent spillage if the container tips over.
- e. Grounding: Storage areas that manage ignitable wastes (paints, solvents or fuels) must ground containers/tanks or metal pallets prior to conducting liquid transfer operations.
- f. Empty Containers: Used empty containers greater than 5 gallons must be marked or labeled "empty" along with the date that the container became empty and managed (dispose or recycle) within one year of that date. Containers less than 5 gallons may be placed in scrap metal or plastic bins unless it held acutely or extremely hazardous material, then it must be disposed of as a waste. (See Contaminated Container Guidance)
- g. Waste Consolidation: During consolidation or transfer operations ensure that the waste being consolidated or transferred is compatible with the container the waste will be consolidated or transferred into. Allow outage for liquid expansion when temperatures rise and clean-up any spills or puddles remaining on the top or sides of containers.

h. Certification: All above ground tanks/tank systems that store or accumulate hazardous waste must have an "Initial Assessment Certification" (renewed every 5 years thereafter) from a independent professional engineer certified in California or the tank/tank system must be exempted in writing from the assessment by the CUPA.

3-4 SATELLITE ACCUMULATION AREAS

- **3-4.1** In order for a generator to manage hazardous waste at a satellite accumulation area *ALL* of the following criteria must apply:
- a. Hazardous waste must be accumulated (stored) in containers only, with volumes not exceeding 55 gallons of a hazardous waste 1 quart of acute or extremely hazardous waste.
- b. The waste must be stored at the initial accumulation point, which must be at or near the area where the waste was generated.
 - (1) "Initial accumulation point" (satellite area): waste cannot be stored at any other location prior to being stored in the satellite area. However, temporary storage may be allowed if the storage is necessary to that waste generation process, and if that waste is placed into the satellite accumulation storage area prior to the end of the work shift of the person that generated the waste.
 - (2) "At or near": the process generating the waste and the satellite accumulation area must be in the same or adjacent room or work area.
- c. The initial accumulation point must be under the control of the operator of the process generating the waste.
 - (1) "Operator of the process": the "hands-on" operator of the machinery or process that generates the hazardous waste, not the overall operator of the generator site or facility as a whole.
 - (2) "Under the control": containers being stored must be in the line of sight of the operator of the process generating the waste or in a locked room or compartment to which the operator can control the access.
- d. The initial accumulation start date must be clearly visible on the hazardous waste label for each container used to stored waste in the satellite area.
 - (1) "Initial start date": the date that the first amount of hazardous waste was placed into the container.
- e. Wastes shall not be accumulated at the satellite area for any longer than 1 year or until the maximum volume limitation (55 gallons or 1 quart) has been reached.
- f. After reaching the applicable storage volume or time limitation (55 gallons, 1 quart or 1 year) the container must be marked with the date that the limitation was reached.

- (1) There will be 2 dates on the container or label, the initial start date (when the waste was first placed into the container) and the end date (when the time or volume limit was reached).
- g. Within 3 days after reaching the applicable volume the waste container must be transferred or relocated to a 90-day hazardous waste storage area, or to an on or offsite permitted storage facility. The total storage time limitation from initial accumulation start date to the disposal of hazardous waste from the generator location shall not exceed 1 year regardless of the volume in the container.
 - (1) If the container is transferred to the 90-day storage area, that container must be relabeled (or use an equivalent labeling system for satellite areas) and the new accumulation start date for that container is the date that the container reached its volume or storage limitation in the satellite storage area (the second date on the container or label).
- h. All containers holding hazardous waste must be in good condition and not leaking, with no excess rust or damage that would potentially compromise the containers integrity.
- i. All containers shall remain closed, except when waste is being added or removed and have secure fitting caps, lids, bungs or rings to avoid spillage if the container was tipped over.
 - (1) Screw in type funnels may be used in place of caps or bungs if the funnel is equipped with a one way check valve.
- j. To avoid any physical or chemical reactions the container used to accumulate waste must be compatible with the waste that it will be containing.

3-5 TRAINING

- a. Waste Handler: All personnel that handle or manage hazardous waste are required to successfully complete either formal classroom training or a <u>supervised</u> on-the-job training program, (Appendix #4) coordinated by qualified hazardous waste personnel within 6 months of being assigned their tasks as a waste handler or coordinator. Followed by an annual refresher program.
- b. Business Plan: Documented training for Hazardous Materials Business Plans is required for any newly assigned personnel and reviewed by all work center personnel annually. This is to update personnel on emergency procedures, spill response and notification requirements, any waste or material storage locations that may have changed and information on materials that are used in the work center.

- c. Shop Specific: Along with the waste handler training, personnel that handle or manage hazardous waste shall have work center specific training, outlining any specific waste-streams processes, permit requirements, record keeping, or other hazardous waste issues.
- d. Designation Letters: Environmental coordinators and or waste handlers are required to have designation letters outlining their job title for their position and a written job description for their duties and responsibilities in managing hazardous waste at their location.

3-6 RECORD KEEPING

- **3-6.1** The following information (a- c) must be available for review and maintained at the generator location for a minimum of 3 years.
- a. Disposal Receipts: Waste turn-in forms, copies from manifests, bills of lading, receipts from recycled oils or other substances, safety kleen change outs, lead acid battery turn-ins or other items turned in or disposed of as a hazardous waste.
- b. Waste Analysis: Lab analysis, waste profile sheets, test results or other documentation from the date the waste was sent for treatment, storage or disposal.
- c. Training Records: Current and previous personnel (from the date they departed) who handle or manage waste must have copies of their environmental training records, letters of designation, job descriptions, diplomas, training certificates or any other environmental training documents.
- d. Inspections: Documentation of daily tank inspection records. Weekly accumulation area inspection records shall be maintained at the generator location for 1 year.

3-7 PERMITS/HAZARDOUS MATERIAL BUSINESS PLANS

- a. Permits: A copy of the "Unified Facility Permit" or other type of permit issued by an authorized agency (CUPA, Fire Department) shall be current, readily available and posted in a conspicuous location.
- b. Business Plans: Hazardous Material Business Plans are required at any location that generates hazardous waste or stores hazardous materials at any time through the year in quantities greater than or equal to 500 pounds of solid, 55 gallons a of liquid or 200 cubic feet of compressed gas. Business Plans identify material and/or waste storage locations, emergency points of contact, emergency and safety procedures, site maps and other information to assist emergency personnel in the event of a spill or release. A copy of the Hazardous Material Business Plan must be maintained at the generator location and must be updated within 30 days whenever there is a change to:
 - (i) The emergency contact person or phone numbers.

- (ii) A significant increase or decrease (50%) in the amount of hazardous material or waste that is used or stored.
 - (iii) The physical relocation of waste or material storage areas.
 - (iv) Installation of waste or material storage tanks
 - (v) Any other pertinent information relating to hazardous waste or materials management.
- c. Documented training must be conducted annually or whenever newly assigned personnel arrive at the shop, work center, or generator location. Review Section 3-5-b.

3-8 HAZARDOUS WASTE TREATMENT

- a. Treatment is defined as any method, process or technique that is designed to change the physical or chemical composition, remove or reduce the toxic or hazardous effects, properties or characteristics of a hazardous material or waste.
- b. Hazardous waste may be treated at the generator location in lieu of or in conjunction with disposal. Environmental regulations require generators that treat hazardous wastes at their location or a process under the generators control must apply for permits that relate to the type of waste being treated.
- c. Refer all questions and provide notification prior to conducting any new process to the base environmental office and Regional Environmental Department, Hazardous Waste Program for additional information regarding hazardous waste treatment and permitting requirements.

3-9 HAZARDOUS WASTE RECYCLING

- a. Generators may classify their hazardous waste as recyclable material, and recycle that hazardous waste at their location without a treatment permit, or have their waste transported to and recycled at a contractors or manufacturers facility. Recyclable material is defined as a hazardous waste that is capable of being recycled or reused.
- b. These recyclable materials are subject to all regulations that apply to hazardous waste generators, and shall not be excluded from the classification as a waste and be used or reused as specified below.
 - (1) The material is used or re-used in an industrial process to make a product not being reclaimed, or is used or reused as a safe and effective substitute for commercial products if the material is not being reclaimed or returned to the original process from which the material was generated, without first being reclaimed.
 - (2) The material is recycled and used at the same facility that generated the material.
 - (3) The material is recycled within the accumulation time of 90 days from when the material was first generated.

- (4) The tank or container used to accumulate the recyclable material shall be labeled, and marked in accordance with the applicable hazardous waste generator requirements. Except that the container or tank must be labeled or clearly marked with the words "Excluded Recyclable Material" instead of "Hazardous Waste".
- (5) The recyclable material shall be stored and handled in accordance with all local ordinances and codes, including, but not limited to fire codes governing the storage and handling of hazardous material.
- (6) Generators that recycle more than 100 kilograms per month (35 gallons) of recyclable material shall; every two years provide in writing, the following information to the local authorizing agency on a official agency form:
 - (a) The name, site address, mailing address, and telephone number of the owner or operator of any facility that recycles the generators material.
 - (b) The name and address of the generator of the recyclable material.
- (7) Recyclable material generated in a process storage tank or pipeline, manufacturing process unit or an associated non-waste treatment manufacturing units are not subject to the notification requirements until the recyclable material is removed from the unit where it was generated, or unless the recyclable material remains in the unit for more than 90 days after the unit ceases to be operated for manufacturing, storage or transportation.
- c. Regardless of paragraphs (a) or (b) all of the following recyclable materials are hazardous waste and subject to full hazardous waste regulations even if the recycling involves use, reuse or return to the original process.
 - (1) Materials used in a manner constituting disposal or used to produce products that are applied to the land including, but not limited to fertilizers, herbicides, soil amendments or agricultural minerals.
 - (2) Materials burned for energy recovery, used to produce a fuel, or contained in fuels. (Contact your environmental office for specific restrictions)
 - (3) Used or spent etchants, stripping or plating solutions that are transported to an offsite facility operated by a person other than the generator.
 - (4) Used oil (See Guidance for Used Oil Management)
 - (5) Materials accumulated speculatively Means a material or waste that is accumulated at the generator location that has no potential and or feasible means of recycling that material or waste within a calendar year.

d. Any person who manages hazardous waste as a recyclable material shall maintain adequate records to demonstrate that there is a known market or disposition for the material and that any exemptions or exclusions are met.

Refer all questions and provide notification prior to conducting any new recycling processes to the base environmental office or Regional Hazardous Waste Program Office for additional information regarding hazardous waste recycling and reporting requirements.

3-10 HAZARDOUS WASTE TURN-IN

- **3-10.1** The following outlines the requirements for shore commands regarding the turn-in (disposal) of hazardous waste regardless if the turn-in is to a government-owned hazardous waste facility or a private hazardous waste transporter.
- a. Ensure all hazardous waste is properly labeled, containerized and segregated. (Note: private hazardous waste transporters may affix a Hazardous Waste DOT label, which will identify the manifest number and proper shipping codes). To schedule a hazardous waste pick-up, contact your base specific hazardous waste facility:

NAVSTA 556-9600/9601 NASNI/NAB 545-6537/6520 SUBASE 553-8029/1303

- b. Only authorized Shaw Infrastructure, Inc. personnel may sign Hazardous Waste Manifests. Additionally, ensure that a copy of the manifest is maintained at the generator location for three years and the original copies are submitted to Shaw Infrastructure, Inc. for proper management and tracking.
- (1) Labeling Once hazardous waste has been place into a container the generator must immediately properly mark or label that container with a weatherproof marker or label with the following information:
 - (i) The container or tank must be clearly marked or labeled with the words "Hazardous Waste".
 - (ii) Composition or contents that make-up the waste (e.g. waste paint, used oil or oil contaminated rags and debris).
 - (iii) Physical state of the waste (e.g. solid, liquid, gas)
 - (iv) Hazardous properties of the waste (e.g. reactive, flammable, corrosive)
 - (v) Name and address of the person (command) generating the waste.
 - (vi) Accumulation start date (when the waste was first placed into the container or tank).

- (2) Containers As a general rule, whenever possible all hazardous waste should be containerized and stored in containers approved by the Department of Transportation (DOT) or the original shipping container supplied by the manufacturer.
 - (i) All containers holding hazardous waste must be managed in a manner to prevent leakage or spillage with secure fitting cap, lids or bungs and that is compatible with the type of waste that it is holding.
 - (ii) For items such as: closed and sealed cans, aerosol cans or non-saturated rags, plastic bags or boxes may be used. However all non-identical waste must have individual labels or marking as specified in section 3-9 a (1).
 - (3) Segregation Separate waste that is non-compatible, either by berms or individual containment devices. Segregate reactive from ignitable or corrosives wastes, sort, store, package and consolidate all waste by hazard class (the wastes potential hazard) to avoid any possible physical or chemical reactions. This will also make them readily identifiable for inspection and spill clean-up.
- c. When disposing of hazardous waste the generator is required to submit supporting documentation that identifies the type and concentration of the waste that is being disposed. This documentation is normally a waste profile sheet used in conjunction with a MSDS for known or non-mixed waste. Laboratory analyses may also be required for unknown wastes or consolidated known waste-stream (e.g. consolidated mixed paints).

UNIVERSAL WASTE MANAGEMENT

4-1 **DEFINITION**

- a. Universal wastes are a frequently generated classification of hazardous waste, which are commonly used by wide ranging community from the general public to industrial processes or operations. These wastes have been specifically granted less stringent waste management and storage requirements than other types of regulated hazardous waste. This allows the generator longer accumulation periods to promote proper recycling, treatment or disposal of larger amounts of the specific wastes.
- b. Currently, in California, universal wastes are comprised of the following classifications of used, spent, discarded or retrograde hazardous waste or materials:

<u>Batteries</u>: all batteries, wet or dry cell, but does not include spent lead-acid automotive type managed under the provisions of the hazardous waste requirements (see Section 11 for Dry Cell Batteries and Automotive Type Batteries).

Fluorescent Lamps: intact which will also include all high intensity discharge, neon, mercury vapor, high-pressure sodium and metal halides lamps.

<u>Mercury Containing Items</u>: all temperature control devices or any other type of devices or switches that contain mercury or ampules of metallic mercury.

<u>Cathode Ray Tubes:</u> intact computer monitors, vacuum tubes, television picture tubes or similar type items that contain lead or any other regulated metal.

<u>Aerosol Containers:</u> any aerosol container managed at the generator location prior to being transferred to the disposal facility.

4-2 MANAGEMENT AND DISPOSAL

- a. To maintain consistent hazardous waste management practices throughout the metro area and to simplify the waste management and training process for shore commands hazardous waste personnel, universal waste generators will continue to properly manage and dispose of their universal waste as hazardous waste. This includes all provisions of storing, accumulation time and containerizing universal wastes under the hazardous waste management requirements of Section #3 of this plan. (See Section 4-3 for labeling Universal Waste)
- b. Universal wastes must be recycled or be disposed of as hazardous waste and may <u>not</u> be placed or discarded in solid waste (trash) containers. This includes fluorescent tubes broken or intact, thermostats or other switches that contain mercury ampules or any type of wet or dry cell batteries.

c. Commands receiving universal waste for disposal, treatment or recycling (Hazardous Waste Facilities or Regional Solid Waste Recycling Facilities) may manage universal waste as specified by environmental laws and regulations.

4-3 **LABELING/MARKINGS**

- a. Each universal waste item that is not in a container and/or each container shall be labeled. Each label shall be identified as "Used", "Waste" or "Universal Waste" followed by the type of universal waste being disposed (i.e. "Used Batteries", "Waste Lamps", Universal Waste-Cathode Ray Tube").
- b. Each label shall also have the accumulation start date placed on it, identifying the date that the waste became a Universal Waste.
- c. A hazardous waste label is not required to be used when labeling Universal Wastes for disposal.

EMERGENCY AND NON EMERGENCY PROCEDURES AND SPILL EQUIPMENT

5-1 PURPOSE

- a. The purpose of this section is to inform command personnel on the process in which hazardous material/waste spills and or releases are handled and reported and to maintain consistency with the spill/release notification requirements established. Upon discovery of <u>any</u> spill or release that meets or exceeds the below criteria, follow the procedures outlined in Section 5-2 below.
 - (i). Any spilled substance that is greater than 5 gallons in total volume.
 - (ii). Spilled substance(s) that enters a storm drain, sewer system or body of water (bay).
 - (iii). The spill is not easily contained and/or requires outside assistance to clean up.
 - (iv). Spills that threaten human health, safety and/or the environment or that is from an unknown substance.

5-2 <u>EMERGENCY SPILL NOTIFICATION/PROCEDURES</u>

- **5-2.1** Spills/Releases: For spills or releases of any hazardous substance meeting the criteria specified in Section 5-1, do the following:
- a. Notify: Call for the spill response team at **9-911** or Central Dispatch at 524-2001 or other appropriate local emergency number and notify your respective Environmental, Navy On-Scene Coordinator (NOSC), CNRSW base environmental office and safety offices.
- b. Secure: Limit the access of personnel to where the spill or release has occurred. Use barrier tape from the spill kit or other warning items or signs to restrict access to the surrounding area.
- c. Identify: Find out what type substance was spilled or released and obtain an MSDS, lab analysis or other information pertaining to that substance.
- d. Isolate: If safe, prevent the spill from spreading, cover or dike any nearby floor, storm, or sewer drains.

In addition, follow all the specified requirements outlined within your Hazardous Materials Business Plan.

5-3 NON EMERGENCY NOTIFICATION PROCEDURES

a. All hazardous substance spills that occur outside of a building must be reported to the base environmental office regardless of whether the spill meets or exceeds the thresholds specified in Section 5-1.

5-4 ENVIRONMENTAL REPORTING

a. The responsible command (the command or activity that has responsibility for the area where the spill or release occurred or was discovered) shall coordinate any and all internal and/or external environmental reporting requirements via Navy policy. In addition, for all spills/releases identified in Section 5-1, complete the Spill/Release reporting form (Appendix #5) and retain it in your environmental files as a permanent facility spill record.

5-5 EMERGENCY EQUIPMENT

- a. Spill Control: Spill kits containing absorbent materials (socks, pads, kitty litter) must be located near the storage/work areas to clean up and control leaking or spilled substances or wastes.
- b. Communication Devices: Telephone, two-way radio, alarms must be located at or near the waste storage area to notify emergency response personnel (fire, security) in case of a spill, release or injury.
- c. Fire Fighting: Portable fire extinguishers or other fire suppression equipment designed to extinguish the specific waste or material being stored must be available at or near the storage area.
- d. Decontamination: Eyewash and or shower stations (depending on the waste being handled) shall be located at or near the storage location or operating process.
- e. Equipment Maintenance: Ensure that all communication, fire fighting, and other emergency equipment is regularly tested and maintained in proper operating condition.

ABANDONED/DISCARDED HAZARDOUS WASTE OR MATERIAL

6-1 PURPOSE

a. To establish a standardized procedure for regional command personnel that discover abandoned or discarded hazardous waste, medical waste or hazardous materials at unauthorized command or base areas (common areas), outlying Navy property (housing areas) or that has been inadvertently placed into solid waste (trash) containers or dumpsters. In addition, this section identifies the steps necessary for the proper reporting, recovery, transportation and disposal of these wastes or materials.

6-2 NOTIFICATION PROCEDURES

a. In the event of the discovery of abandoned or discarded hazardous waste or hazardous materials, the discovering person or persons shall notify **9-911** and report the incident.

NOTE: Non CNRSW regional commands or activities shall coordinate the recovery, transportation and disposal of wastes or materials using current command Environmental SOP.

6-3 TRANSPORTATION

- a. A licensed and fully trained hazardous waste hauler shall be the only entity authorized to transport Navy owned abandoned, discarded or recovered hazardous waste or materials.
- b. All recovered abandoned or discarded hazardous waste, medical wastes or hazardous materials, along with all corresponding documentation (manifests, if applicable) shall be transported to a permitted, Navy owned, hazardous waste storage facility.

6-4 DISPOSAL

- a. All abandoned or discarded wastes or materials that have been recovered shall be managed and disposed of as hazardous waste even if the material could be deemed "usable" or recycled.
- b. Any recovered medical wastes shall be held at a permitted, Navy owned, waste storage facility permitted to accept medical waste until arrangements can be made for transportation and disposal to an authorized medical waste disposal facility.

NOTE: If command or activity personnel are notified by a regulatory or other official agency that hazardous waste or materials from their organization have been recovered from a landfill or other location, immediately notify the CNRSW Hazardous Waste Program Office @ 524-6351.

HAZARDOUS WASTE MINIMIZATION

7-1 PURPOSE

a. The Hazardous Waste Source Reduction and Management Review Act, requires generators of hazardous waste to reduce the waste they generate. Additionally, the Pollution Prevention Act established the national policy that effects all operations or processes that generate pollutants hazardous or toxic waste. Stating "pollution should be prevented or reduced at the source whenever feasible, pollution that cannot be prevented should be recycled or treated in a environmentally safe manner, with disposal being the last option". To reduce the amount of hazardous waste generated, commands need to evaluate which processes or operations cause the generation of waste and what steps, process changes, chemical substitutes or modifications can be implemented to reduce or eliminate the generation of hazardous waste.

7-2 IMPLEMENTATION

- a. Pollution reduction and prevention can be accomplished by specific process review or operational improvement measures commonly known as Source Reduction. Outlined below are specific waste minimization measures that may be implemented to reduce the amount of hazardous waste generated and to reduce the overall waste disposal cost.
 - (1) Operational Controls: Command personnel should minimize the use of hazardous materials or use less hazardous products or substances whenever possible, incorporate operational improvements, chemical/material substitution or process modifications, thus potentially reducing or eliminating the generation of hazardous waste at the source or at the initial point of generation. Substitution of raw materials or chemicals may offer the greatest opportunity for waste reduction. Replace materials that generate large amounts of hazardous waste with materials that produce little or no waste
 - (2) Administrative Controls: Implementing best management practices or centrally managed material inventory controls; can reduce the amount of expired, excess or retrograde materials from being disposed of as a hazardous waste. Procedural changes can be implemented in many areas of the operational process such as chemical change-out timeframes. Since these procedures only effect the operating parameters they can be implemented at no or low cost to the activity. Additionally, implementing a strict and thorough maintenance program that stresses corrective and preventive maintenance, prevents release of hazardous materials due to equipment brake down or failure.
 - (3) Recycling/Re-use: Numerous types of hazardous waste (e.g. oils, solvents) may be re-used or recycled at the process, command hazardous waste site, or by a contractor at an offsite location. Metal or plastic containers less than 5 gallons in capacity, holding hazardous material may also be recycled as scrap, pending *ALL* the material or residue has been removed. Solvents could be re-used in cleaning or degreasing

process, which may only require surface preparation prior to another cleaning or stripping process. Review Section 3- 9 for the specific requirements regarding hazardous waste recycling.

- (4) Treatment: Treating wastes can be effectively used to reduce the volume of hazardous waste generated and waste disposal cost by converting the waste to a non-hazardous or less toxic state. However, hazardous waste treatment requires permitting and specialized treatment units, which could potentially offset any saving in waste disposal cost. For additional information on hazardous waste treatment refer to Section 3-8.
- (5) Training: Training command personnel on basic material handling practices can result in immediate and direct reductions of waste generation and cost savings. This can involve taking steps as basic as compliance with existing hazardous material or waste management regulations, the operational capacity and capabilities of different types of work- centers equipment (presses, conveyers, forklifts etc.) to prevent spills or overfills during maintenance, to keeping containers closed to prevent the deterioration or spillage of the material.

CONTRACTOR RESPONSIBILITIES

8-1 CONTRACTOR GENERATED WASTES

- a. All contractors conducting operations or processes located at Regionalized Commands or Activities that produce "contractor generated" hazardous waste shall, label, segregate, accumulate, containerize, dispose and overall manage their waste as "the generator of the hazardous waste" in accordance with all Federal, states and local environmental laws or regulations and including but not limited to the following.
 - (1) Hazardous waste shall be placed into Department of Transportation (DOT) shipping containers.
 - (2) All wastes shall be compatible with the containers used to store the waste.
 - (3) Inspect their container storage area weekly, checking for open or leaking containers, missing labels, and or deterioration of containers or containment system.
 - (4) Ignitable and or reactive waste must be stored at least 50 feet from the base property line or from the closest inhabitable building.
 - (5) All containers shall be kept closed during storage except when adding or removing contents.
 - (6) All waste/material must be compatible if they are mixed or consolidated.
 - (7) All containers must have a clearly and properly filled out label with the accumulation start date.
 - (8) All waste must be properly disposed within 90 days from the initial accumulation start date.
 - (9) Hazardous waste/material shall not be placed or disposed in dumpsters or other solid waste (trash) containers.
 - (10) All hazardous waste/material spill or releases regardless of quantity must immediately be reported to the Federal Fire Department at 9-911. Cost of the clean-up and disposal of the spilled or released material shall be the sole responsibility of the contractor.

8-2 CONTRACTOR GENERATED NAVY WASTE

a. All Regionalized Commands or Activities using contractors that generate Navy owned hazardous waste shall be responsible for the proper management of their waste in accordance with the provisions of the Regional Hazardous Waste Management Plan.

NOTE: Contractors, refer all questions or comments regarding this section to the ROICC Contract Office or environmental point of contact.
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MEDICAL WASTE

9-1 BIOMEDICAL WASTE

- a. Biomedical Waste is any waste not classified as hazardous waste that has been generated or used in the diagnosis, research, treatment, and immunization to human beings or animals or in the production or testing of biologicals or which contain infectious agents that may pose a substantial threat to human health.
- b. Biomedical wastes are divided into 3 subcategories, each having it's own unique definition and specific management requirement. They include:
 - (1) Medical Solid Waste: includes empty specimen containers, bandages and dressings containing non-liquid blood, surgical gloves, and decontaminated (autoclaved) biohazardous waste or other materials that are not considered biohazards.
 - (2) <u>Bio-Hazardous Waste</u>: includes any of the following wastes:
 - (i) Laboratory wastes (medical or pathological) including specimen cultures, infectious agents, vaccines, culture dishes or materials that may contain infectious agents that may pose a substantial threat to human health.
 - (ii) Recognizable fluid blood, regulated body fluids, containers contaminated with blood or body fluid elements that have separated from the solid portion of the waste under normal temperature.
 - (iii) Sharps or devices having rigid edges or corners that are capable of cutting or piercing, including hypodermic needles blades and lancets.
 - (iv) Contaminated animal carcasses, body parts or excrements of animals resulting from the production of biologicals, testing of pharmaceuticals that are suspected to be communicable to humans.
 - (v) Surgical specimens including human or animal parts or any specimens sent to a lab for microbiologic analysis.
 - (3) Pharmaceuticals: (Waste) are any expired, damaged or contaminated prescription or over-the-counter human or veterinary drug or medication that are no longer needed or used for their intended purpose.

NOTE: Although medical waste in nature, Atropine Auto Injectors, 2-Pan Chloride, Iodine and Isopropyl Alcohol must be managed and disposed of as a hazardous waste.

9-2 Accumulation and Containerization

a. Medical waste must be accumulated separately from hazardous waste or materials and in an enclosed or designated location that is secure or lockable to deny access to unauthorized personnel. Additionally, warning signs shall be posted in <u>both</u> English and Spanish identifying the accumulation area, reading:

"CAUTION – BIOHAZARDOUS WASTE STORAGE AREA – UNAUTHORIZED PERSONS KEEP OUT" CUIDADO – ZONA DE RESIDOS- BIOLOGICOS PELIGROSOS – PROHIBIDA LA ENTRADA APERSONS NO AUTHORIZADAS"

- b. Medical waste, including sharps, shall not be accumulated at the generator location for longer than 7 days from the date the container becomes full if the generator produces greater than 20 pounds per month and the waste is accumulated at above 32 degrees Fahrenheit.
- c. A generator producing less than 20 pounds of waste per month at above 32 degrees Fahrenheit may accumulate their waste for up to 30 days from the date the container becomes full.
- d. Containers shall be marked or labeled "biohazardous waste" or with the international biohazard symbol with the word "biohazard" and with the generators name address and telephone number.
- e. Containers shall be leak resistant and have tight fitting covers, bags must be accumulated and placed in ridged containers and must be sealed to prevent leakage or spillage of their contents.
- f. Expired or waste pharmaceuticals must be placed into clear plastic bags with the activity's name, address, telephone number and a point of contact.

9-3 Medical Waste Management Plan

a. Activities that generate medical wastes shall insure that the required Medical Waste Plan is completed and posted at or near where medical waste is accumulated. The management plan must be updated and submitted to the CUPA within 30-days when any change occurs to the plan (such as POC change or amount of waste generated). The changes in the management plan will be forwarded to the CNRSW Hazardous Waste Program Office via your respective base environmental office.

9-4 Record Keeping

a. Waste turn-in records and "Certificate of Destruction" are required to be maintained at the generator location for 3 years.

APPENDICES

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APPENDIX 2	WEEKLY STORAGE AREA INSPECTION FORM
APPENDIX 3	DAILY TANK INSPECTION FORM
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APPENDIX 5	SPILL REPORT
APPENDIX 6	NAVY REGION SOUTHWEST POINTS OF CONTACT

APPENDIX 1

HAZARDOUS WASTE HANDLER/COORDINATOR APPOINTMENT LETTER AND JOB DESCRIPTION

F	rom:	
T	o:	

Subj: APPOINTMENT AS HAZARDOUS WASTE HANDLER/COORDINATOR

Ref: (a) Title 40, Code of Federal Regulations, Part 260 - 265

- (b) Title 22, California Code of Regulations, 66265.16
- (c) OPNAVINST 5090.1 Series
- 1. You are hereby appointed Hazardous Waste Handler/Coordinator for _______. As the Hazardous Waste Handler/Coordinator you are responsible for being familiar and ensuring compliance with the "cradle to grave" provisions as a "generator of hazardous waste". Responsible for the proper disposal, storage and overall hazardous waste management for your work center within your area of responsibility as specified by the Federal, State and local hazardous waste regulations, references (a) & (b) and Navy Environmental Policy, Guidance or Instructions. Your duties shall include but not limited to the following:
- a. Maintain records for the Hazardous Waste Program, including, letters of designation, personnel environmental training documentation, hazardous waste turn-in documents, storage area and tank inspection records, business plans, waste profile sheets, lab analysis, and copies of manifests or bills of lading. This documentation shall be maintained at the generator location for three years.
- b. Ensure storage/accumulation area is inspected weekly with adequate aisle space between rows of containers (2 feet minimum). Maintain at or near the waste storage/accumulation area sufficient spill control equipment able to absorb or contain the amounts and types of waste being stored and have available a properly functioning communication or alarm system to notify emergency personnel incase of injury, spills or releases.
- c. Ensure all hazardous waste and or recyclable materials are properly identified, labeled, containerized, segregated by hazard class and turned-in for proper hazardous waste disposal prior to the 90-day storage limit or other applicable waste storage limits.
- d. Ensure all containers are kept closed, with proper fitting lids bungs or caps, are in good condition with no severe rust or dents, are compatible with the waste they contain, have no accumulated waste or residues on the tops of containers and are stored at least 50 feet from the property line. Flammables must be grounded during waste consolidation operations.

- e. Ensure all hazardous waste tanks have documented daily inspections, check for leaks, spills or other signs of release around the tank, piping and in the secondary containment, check the tank, piping and foundation for cracks gaps or other structural damage. Check the tanks alarm system for proper operation, and annual certification (if applicable). Ensure tank and or piping are properly labeled with secure fitting covers, tanks with no covers must have a minimum 2 feet of freeboard.
- f. Attend formal or supervised on-the-job training as provided by the Regional Environmental Department within six months from being appointed to this position with annual hazardous waste refresher training as required.
- g. Ensure training is conducted for work center personnel on emergency procedures for spills or releases, spill clean-up, fire suppression and safety equipment and locations, waste/material storage and handling requirements or any other specific environmental requirements that apply too your shop.
- h. Notify emergency response personnel @ 9-911, Environmental, Safety departments whenever there is a spill of hazardous waste/material that meets or exceed the report thresholds or if any amount of waste or material enters storm drains, sewer system or is released into a body of water.
- i. Notify the Environmental Department whenever there are: changes to the business plan site map, change in emergency contact person or phone number, or upon the installation or modification of any hazardous waste tanks, or any other work center changes that effect the hazardous waste program.

2.	I have read and understand my position and job description as Hazardous Waste
Han	dler/Coordinator and that I will be held accountable to fully comply with all applicable
envi	ronmental regulations and Navy environmental policies

	Date
Hazardous Waste Handler/Coordinator	
	Date
Supervisor	

HAZARDOUS WASTE STORAGE AREA WEEKLY INSPECTION FORM

		YES	NO
1.	STORAGE AREA All trash or debris disposed of properly. Any sign of spills or releases. Adequate aisle space and clear access.	0 0 0	O O O
2.	CONTAINERS Are any containers leaking. Lids and bungs securely closed. Are any containers damaged or bulging. Ignitable containers grounded (during transfer operations). Are non-compatible waste segregated. Are empty containers > 5 gallons labeled and dated when emptied.	0 0 0 0 0	0 0 0 0 0
3.	LABELS Are all containers labeled. Are labels properly and completely filled out and readable. Is accumulation date less than 90 days.	0 0 0	O O O
4.	SECONDARY CONTAINMENT Are there any cracks, gaps or splitting. Are floor drains/valves p lugged or closed. Any accumulated liquid or waste in the containment area.	0 0 0	O O O
5.	EMERGENCY EQUIPMENT Fire extinguishers in operating condition. Safety shower/eyewash operating correctly. Spill kits or absorbent material available. Communication or alarm system is operational.	0 0 0 0	O O O
Co	mments/Corrective Action		
Ins	pector	Date	

HAZARDOUS WASTE DAILY TANK INSPECTION FORM

The operator shall inspect at least once each operating day:

	SAT	UNSAT	N/A
Overfill/ spill control equipment, waste feed cutoff or drainage system to ensure that is in good working order.	0	0	0
2. Aboveground portions of the tank system (valves, hoses, piping) to detect any corrosion, cracks or leaks.	0	0	0
3. Data on monitoring/leak detection equipment to ensure the tank system is operated according to design.	0	0	0
4. Surrounding areas of the tank system, and foundation to cracks, dead vegetation, erosion or signs of release.	0	0	0
5. Ensure that tanks with no covers have a minimum of 2 feet of freeboard.	0	0	0
6. Ensure that the hazardous waste label is properly filled out and is readable.	0	0	0
7. Ensure the tanks secondary containment system has no cracks, deterioration, accumulated liquids or sludge.	0	O	0
COMMENTS/CORRECTIVE ACTION			
Inspector	Date		

APPENDIX 4

HAZARDOUS WASTE ON THE JOB TRAINING REQUIREMENTS

- 1. Personnel that manage hazardous waste shall successfully complete an on-the-job or formal classroom training program that teaches them to perform their duties in a way that ensures the compliance with hazardous waste requirements. (See section 3-5 a)
- 2. This training program must be directed by a person trained in hazardous waste management procedures and shall include instructions which teaches personnel hazardous waste management operations, emergency procedures, and compliance requirements relevant to the positions in which they are assigned.
- 3. At a minimum, this program shall be designed to ensure those personnel:
 - a. Are able to respond effectively to emergencies by familiarizing themselves with emergency procedures, equipment and systems that are specific to your work-center.
 - b. Are able to identify, separate and segregate hazardous waste by hazardous class and or compatibility of the wastes.
 - c. Are able to properly containerize, manage and label hazardous waste.
 - d. Conduct hazardous waste accumulation area inspections by identifying deficiencies and performing corrective actions.
 - e. Shall take part in an annual review of the initial hazardous waste training as it applies to their assigned duties.
 - f. Comply with all requirements identified within this Hazardous Waste Management Plan.
- 4. All training shall be in a written format and have documentation of personnel receiving the training and shall be provided to the inspecting agency upon request.



Spill Report

Name of the person reporting.
Command reporting spill.
Phone number of the person reporting.
Date and time that the spill occurred.
Exact address or location of the spill.
Type of hazardous material or waste spilled.
The amount of hazardous material or waste spilled.
Describe the conditions at the spill location.
Describe control and containment.
Describe samples taken.
What notifications were made?
Disposition of spilled substance.

APPENDIX 6

NAVY REGION SOUTHWEST POINTS OF CONTACT

REGIONAL HAZARDOUS WASTE PROGRAM

Christina Graulau - Director 524-6351

Linda Morgan 524-6371

Brian Eccleston 553-7524

Daryel Stager 556-1879

David Freeman 524-6307

Phil Dyck 524-6384

BASE ENVIRONMENTAL OFFICE SUPERVISORS

CORONADO

Archie Ordonio 545-3429

MAINSIDE

Mark Edson 556-1532

POINT LOMA

Luis Perez 553-0526

HAZARDOUS WASTE OPERATIONS

James Sanfedele - FEC Designated Government Representative	571-4183
Paul Crecelius – FEC Subject Matter Expert for Containerized Waste	666-1811
Michael McGriffin – FEC Subject Matter Expert for Bulk Waste	571-4175
Joe Arlaskus – FEC Subject Matter Expert for Laboratory Services	545-8432
NAVSTA Facility	556-9600
NASNI Facility	545-6577
SUBASE Facility	553-1303
Laboratory	545-8431

SECTION 11

HAZARDOUS WASTE GUIDANCE DOCUMENTS

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Hazardous Waste Management Plan April 2005

HAZARDOUS WASTE GUIDANCE FOR CONTAMINATED CONTAINERS



- All containers or liners that previously contained hazardous materials must be EMPTY before being placed into recycling bins or the trash.
- Containers or liners include; drums, bottles, buckets, plastic bags, boxes or similar items.
- Empty; means that ALL of the remaining material must be removed by chipping, scraping, pumping or draining. Rinsing is not acceptable for it creates more waste.
- Empty containers or liners less than 5 gallons in capacity may be placed into scrap metal or recyclable plastic bins.
- Containers or liners greater than 5 gallon in capacity must be marked empty and dated with the date that the container or liner became empty and managed (recycled or disposed) of within 1 year.



- For containers over 5 gallons in capacity, a record must be maintained of the person or vender that the container was sent to, turn-in records will work if the containers go to the complex Hazardous Waste Facility for waste disposal
- Porous containers such as cardboard, paper or fabric must be disposed of as hazardous waste if they come in contact with a hazardous waste or absorb and become saturated with a hazardous material.



- Compressed gas cylinders are empty when they reach atmospheric pressure through normal operations, venting is not authorized.
- Household type cleaning materials (cleaners or disinfectants) containers less than 5 gallons are exempt and empty when they are rinsed and the rinse water is used in the cleaning process.

Note: If all of the residual material cannot be removed or the container or liner held acute or

extremely hazardous material, then they must be disposed of as hazardous waste.

 Keep all containers closed with proper fitting lids, seals or gaskets. Replace or repack any containers that are leaking, in poor condition, or that have torn bags or boxes.

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HAZARDOUS WASTE GUIDANCE FOR HAZARDOUS MATERIALS



MANAGEMENT

- Hazardous Material Business Plans and Unified Facility Permits are required for shops that store hazardous materials at any one time in volumes that exceed 200 cubic feet of a compressed gas, 500 pounds of solid or 55 gallons of a liquid.
- Business Plan refresher training must be conducted and documented annually. Newly assigned personnel must be trained on the Business Plan requirements prior to the annual refresher review.
- Ensure all containers are identified with readable labels or markings; replace any labels that are unreadable, torn, faded or missing

- Separate ignitable, corrosive, or oxidizing material in storage lockers or cabinets.
- During hazardous waste compliance inspections, the inspector has the authority to review and inspect hazardous material lockers for the following areas of compliance:
- Is the material labeled? Material that is unlabeled or inadequately labeled or that cannot be identified is considered waste and must be managed in accordance with its hazardous properties or characteristics, unless the material can be identified and be properly labeled within 10 days.
- Is the material container in good condition?
 Damaged containers either badly rusted, with large dents or not otherwise structurally sound must be re-packaged within four days to avoid being classified as a waste.
- Is the container closed? Containers must remain closed when the product not being used.

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HAZARDOUS WASTE GUIDANCE FOR

CONSTRUCTION DEBRIS CONTAINING LEAD BASED PAINT



 A material is classified as "Retrograde" and are considered a hazardous waste if the material is not used or returned to the manufacture 1 year after the materials expiration or extension date.



- Construction debris may be transported to a landfill as solid waste in containers or bins that have covered or that have tarps.
- Any paint (chips or dust) that separates from the debris must be collected and evaluated to determine if the paint is a hazardous waste, by having a lab analyze a sample using a Title 22 metals test method.
- While pending analysis, paint chips must be containerized and identified as "Paint Chip Pending Analysis"
- Most commonly, the metals lead; chromium, nickel and zinc cause paints to be considered hazardous waste.



 Construction and Demolition debris that contain lead or other heavy metals in the

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 Painted construction debris containing lead or other heavy metals above the regulatory limits is <u>not</u> considered to be <u>hazardous</u> waste if the paint is <u>not</u> peeling, flaking, chipping or what is considered "finely divided". paint are <u>not</u> required to be managed as Hazardous Waste or Special Waste if the paint is "Tightly Adhered" to the substrate.

OMPOUNDS SASTI

- Older electrical equipment or components (pre 1979) may contain PCB material. PCB's appear as an amber colored or dark oily liquid that resembles motor oil and may have an order similar to mothballs.
- PCB's may also be known by several trade names, such as; Aroclor, Askarel, Eucarel, Pyanol, Clorinol, Nepolin, Saf-T-Kul, EEC-18, Elemex and Intereen.
- PCBs become regulated as hazardous waste when the concentration is equal to or greater than 5 ppm (parts per million) in liquids and 50 ppm in non-liquids.
- PCB concentrations of 5,000 ppm or greater is considered extremely hazardous waste.
- Transformer cases or other similar items <u>must</u> be managed as hazardous waste if the material they contained had concentrations of PCBs greater than or equal to 5 ppm.

Note: If paints or debris are hazardous waste they must be managed and disposed of accordingly and <u>not</u> sent to the landfill for disposal. If you are unable to determine if your painted debris is hazardous contact the Regional Environmental Department for assistance at 524-6351.





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 Electrical equipment (capacitors, light ballast or fixtures) with a concentration of 5 ppm or greater of PCBs are to be managed as hazardous waste.



- Fluorescent light ballast that have no concentration level stated or are not marked "PCB Free" or "NO PCB's" should be considered and managed as hazardous waste.
- Non-PCB ballasts may contain the regulated chemical Diethylhexyl Phthalate (DEHP). This chemical may be found in ballast F-40 & F-96. These ballast must be managed as hazardous waste.
- Light ballast that contains no PCB's, DEHP or other liquids may be managed as trash.



- Absorbent materials are considered only contaminated when it comes in contact and absorbs a hazardous material or substance.
- Contaminated absorbent may be re-used to clean up another mishap where a similar material or substance was spilled (i.e. POL's).



 Specific hazardous materials such as battery acid, hydrogen peroxide, or pesticides should be promptly disposed of as hazardous waste.

Note: If you are unable to determine if your electrical equipment contains PCBs, contact your respective CNRSW base environmental office or the CNRSW Hazardous Waste Program Office at 524-6307 or 524-6351

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HAZARDOUS WASTE GUIDANCE FOR USED ABSORBENT

HAZARDOUS WASTE GUIDANCE FOR



- Contaminated absorbent materials are classified as hazardous waste when:
 - It becomes unable to absorb the spilled substance or material.
 - Becomes saturated with a spilled substance or material.
 - Reaches the concentration level that exceeds the regulatory limit for that specific material or substance.
- Absorbent materials, which absorb a hazardous waste, must be managed as hazardous waste.
- Usable contaminated absorbent materials placed into containers for future use must be labeled "Usable Absorbent"

Note: If a shop consistently generates (produces) the same type of absorbent waste-streams (type of waste) the initial testing of a representative sample may be used as a basis in determining when or if the used absorbent reaches the concentration level and becomes hazardous waste.

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SPENT DRY CELL BATTERIES

 Spent or discarded alkaline or other types of dry cell batteries are to be managed as a hazardous waste or universal waste and are not to be placed or disposed of into the trash.



- All batteries regardless of type shall be stored, accumulated or transferred in a manner that minimizes the possibility of fire, explosion or any release of hazardous substances into the environment.
- Regardless of the batteries contaminates or constituents no battery that contains any amount of aqueous or other type of liquid material may be discarded into the trash.



- Batteries that contain zinc electrodes and are not hazardous for any other constituents (such as corrosively or heavy metals) are not classified as hazardous waste and may be discarded into the trash by the original user.
- All other types of batteries (Nickel-Cadmium, Lithium, Mercury, Zinc Chloride etc..) shall be similarly managed and disposed of as a hazardous waste or sent to a authorized recycling facility.
- Batteries managed as Universal Waste shall be labeled as "Used Batteries" or "Universal Waste – Batteries"

HAZARDOUS WASTE GUIDANCE FOR USED OIL MANAGEMENT



- USED OIL includes: engine, transmission, gear/gearbox, hydraulic, turbine, bearing, refrigeration, compressor, transformer (electrical) or metalworking oils.
- USED OIL does not include: antifreeze, brake fluids, solvents, fuels, grease, tank bottoms, oily waste water or oils contaminated with halogens (1000ppm) or PCB's (5ppm), with flash points less than 100 degrees F or mixed with any hazardous waste.



 Used oil in any quantity shall be labeled, stored disposed or otherwise managed as hazardous waste prior to testing and or recycling.

- Used oil should be tested annually to determine proper waste determine and profiling.
- Above ground tanks or containers accumulating used oil and fill pipes that transfer used oil to underground tanks shall be labeled "Used Oil – Hazardous Waste", initial accumulation start date and the name and address of the generator.



 Commands recycling used at their location must follow the hazardous waste recycling requirement.

Note: used oils may be managed as recyclable material provided that the provisions of the California Health and Safety Code, beginning with Section 25250.1 or 25143.2 for onsite recycling are followed, with all certification and record keeping requirements are met.

HAZARDOUS WASTE GUIDANCE FOR

AUTOMOTIVE TYPE SPENT LEAD ACID BATTERIES



- The following management requirements apply to persons that generate, store or transport off-site spent lead acid batteries.
 - If more than one ton of batteries are stored at the generator location the maximum storage time is up to 180 days. Or;
 - If less than one ton of batteries are stored at the generator location the maximum storage time is up to one year.
 - Generators shall use a "Bill of Lading" or "Manifest" to transport lead acid batteries to a person or persons who stores, reuses, recycles or reclaims batteries.
 - Generators must retain copies of the manifests or bill of lading for shipments of lead acid batteries for a period of 3 years.



- Individual batteries or containers holding non-damaged batteries must be labeled with indelible ink, paint or other weather resistant materials, and managed in a manner that prevents the container from tipping, spilling or leaking.
- Generators shall obtain a receipt or other documentation for spent batteries provided to venders



- Damaged or leaking batteries shall be managed as hazardous waste.
- Damaged batteries must be stored in non-reactive, structurally secure, closed container labeled with the date when the first battery was placed into that container.

Note: Batteries missing one or more caps are considered damaged.

HAZARDOUS WASTE GUIDANCE FOR USED OIL FILTERS

 Disposal of used oil filters in the trash or at municipal landfills is prohibited.



- Used oil filters must be stored, labeled and managed as a hazardous waste or must be managed to meet ALL the following requirements:
 - Used filters must not contain any free flowing oil – (free flowing means a continuous stream, not drop by drop).
 - If the filter has a device that impedes drainage, that device must be manipulated to allow the oil to be removed.
 - Containers must be labeled "Drained Used Oil Filters", the initial accumulation start date or the date that the filters were first received.



 Filters must be stored in containers that are rainproof, non-leaking and have tightly sealed lids.



- Maximum storage limit is up to 1 year for less than 1 ton of drained filters or up to 180 days for greater than 1 ton.
- If filters are transported off-base a "Bill of Lading" or Hazardous Waste Manifest must be used and retained for 3 years at the generator location. If filters are turned-in to the complex Hazardous Waste Facility, turn-in documents must be maintained for 3 years.
- Any residual oil remaining in the container which held used oil filters shall be collected and managed as hazardous waste.

HAZARDOUS WASTE GUIDANCE FOR PROCESS ASH RESIDUALS

 Combustion operations such as baking, or burning-off of paints or other coating that leaves residual ash <u>may</u> need to be managed as <u>hazardous</u> waste.



- Ash residuals may contain heavy metals from the burned-off coating (lead, chrome, and zinc) in concentrations that exceed regulatory limits for hazardous waste. In addition, dioxins or vinyl chlorides may be present if plastics (PVC) or other chlorinated compounds were placed in the incineration process.
- Residual ashes need to be analyzed to determine if regulatory thresholds have been exceeded.

- When analyzing samples, request Title 22 metals and corrosivity. If dioxins are believed to be present, check with the lab representative for the proper analysis.
- After the ash has been analyzed and determined not to be a hazardous waste it may be disposed of as an Industrial Solid Waste to a municipal landfill under Special Waste provisions. (Refer to guidance regarding Special Waste Manifesting).



 Lab analysis must be retained for a minimum of 3 years for waste stream determination.

Note: Contact the CNRSW Hazardous Waste Program Office or your respective CNRSW base environmental office for assistance in determining if your ash is hazardous waste or may be classified as special waste.

HAZARDOUS WASTE GUIDANCE FOR EXPIRED CHEMICALS AND MATERIALS



- Hazardous materials or chemicals become regulated as hazardous waste:
 - When it is discarded, regardless of it's expiration date. Or,
 - When the material poses a threat to human health or the environment, the material is mislabeled or inadequately labeled (unless corrected within 10 days) or the packaging or container is damaged (unless corrected within 4 days) regardless of the exemption date.

- When the material or chemical is a "retrograde material", meaning it will not be used or distributed for it's original or intended purpose and has exceeded the specific or recommended shelf life after the specified date:
 - One year after the date when the material becomes a retrograde material or chemical.
 - After one year, the material or chemical is a "recyclable material" which is managed as a hazardous waste unless it falls into a provision of the Health and Safety Code for reuse or recycling.





Note: Used or excess hazardous material, chemicals or substances, expired or not must never be disposed of into any solid waste (trash) containers or receptacles.

HAZARDOUS WASTE GUIDANCE FOR SCRAP METAL PRODUCES

- Scrap metal is defined as one or more of the following:
- Manufactured solid metal objects and products.
- Metalworkings, including cuttings, trimmings, grinding, shavings or sandings.



- Solid metal residues of metal products.
- Empty containers meeting the requirements of Guidance for Contaminated Containers



Scrap metal does NOT include the following:

- Spent lead-acid batteries, elemental mercury or water reactive metals such as sodium, potassium and lithium.
- Metal products that have been painted and the paint has deteriorated to the point where it is chipping, peeling, flaking and when tested, would be classified as a hazardous waste.



(Once the loose material (as shown above) is removed, the metal product would revert to scrap metal.)

- Magnesium or Beryllium borings, trimmings, grindings, shavings or sandings.
- Metals contaminated with oil that is a hazardous waste and is free-flowing.
- Waste metal products or byproducts that are sludge's, fine powders, semi-solids or in liquid solutions that are hazardous wastes.



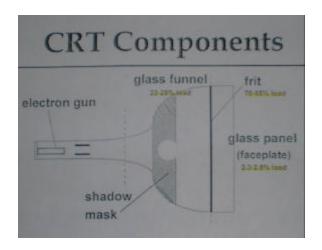
Note: Metal not meeting the definition of "Scrap Metal" must be managed and disposed of as hazardous waste.

HAZARDOUS WASTE GUIDANCE FOR NON-RADIOACTIVE CATHODE RAY TUBES

Spent, discarded or unserviceable CRT's (not being recycled) including computer monitors, vacuum tubes, television picture tubes or similar type tubes a re considered hazardous waste unless lab analysis or other documentation determines otherwise.



- Depending on the size and year manufactured, CRT's can contain between 1.5 and 6 pounds of lead, lead compounds (lead oxide) or lead containing materials (leaded glass).
- CRT's must be handled, stored or otherwise managed in a manner to reduce the possibility of being broken or otherwise damaged.



- Broken CRT's shall be labeled and managed as hazardous waste and not discarded into the trash or other solid waste receptacles.
- Intact, spent or discarded CRT's shall be labeled "Waste CRTs", "Used CRTs" or "Universal Waste-CRTs" with the accumulation start date.

(You are not required to use a hazardous waste label for intact tubes labeled in this manner).



 All CRT's being recycled or disposed of shall not be accumulated at the generator location for longer than 90-days.

Note: If CRT's are identified as a Low Level Radioactive Waste (LLRW) notify the CNRSW Hazardous Waste Program Office and manage the CRT in accordance with Guidance for LLRW. If the CRT is a radioactive waste contact your RASO and manage in accordance with Navy policy.

Activities receiving CRT's for disposal or recycling (Hazardous Waste Facilities or Regional Recycling) may manage CRT's under the provisions of Universal Waste.

HAZARDOUS WASTE GUIDANCE FOR

LATEX PAINT AND DEBRIS



- Non-hazardous debris contaminated with dried latex paint may be managed as solid waste and disposed of into the trash.
- For the propose of this document nonhazardous debris would be cardboard, drop cloths, clothing, rags, tape, roller pad, brushes, paint trays and similar items not contaminated with any other non-latex paints, oils, solvents or hazardous waste.



 Paint brushes, roller pads or other painting equipment containing latex paints may be rinsed and cleaned with water into deepsinks that discharge into industrial sewers.

- Rinsing out or cleaning paint brushes, roller pads or other painting equipment on the ground or into storm drains is strictly prohibited.
- Latex paint chips shall be managed as hazardous waste unless lab analysis determines otherwise. These chips may have absorbed or come in contact with other contaminants that would cause them to be classified as hazardous.



- Discarded cans or containers of latex paints must be managed in accordance with Guidance for Contaminated Containers.
- Liquid or semi-solid latex paint or containers holding such paint shall not be placed, poured or otherwise discarded into deep sinks, trash containers or dumpsters.

NOTE: Check all latex paints MSDS. If the paint being applied contains fungicides or algaecides this guidance does not apply. Manage all residual discarded paints, debris or contaminated items for these paints as hazardous waste.

HAZARDOUS WASTE GUIDANCE FOR FLUORESCENT AND HIGH DISCHARGE LIGHTING WASTE

 Spent, intact fluorescent light tubes and high intensity discharge (HID) lamps (mercury, sodium or metal halide) not being recycled shall be managed as hazardous waste.



- Broken spent fluorescent tubes and HID lighting wastes shall be labeled and managed as hazardous waste.
- Intact tubes or lamps shall be managed in a manner that minimizes the possibility of being broken or otherwise damaged.



 All lamps or tubes being recycled or disposed of shall not be accumulated at the generator location for longer than 90-days. Fluorescent tubes or HID lamps broken or intact shall NOT be disposed of into trash containers, dumpsters or other solid waste receptacles unless specifically authorized by CNRSW Hazardous Waste Program Office.



- Incandescent light bulbs are not classified as hazardous waste and may be disposed of into the trash.
- Green end caped "Philips Altos" have been determined to be non-hazardous and may be recycled vice being managed as hazardous waste.



 Spent, non-broken lamps shall be labeled "Used Lamps", Waste Lamps", and whenever possible, placed into the original boxes.

NOTE: The long standing DTSC Policy governing the disposal of 25 fluorescent tubes per day in dumpsters HAS BEEN REPEALED. Any disposal of above mentioned light tubes or lamps, as solid waste is a violation of California Environmental Law.

HAZARDOUS WASTE GUIDANCE FOR ASBESTOS CONTAINING MATERIALS

Asbestos Containing Materials (ACM)
 includes but not limited to: floor tile, roofing
 materials, acoustic materials, pipe, boiler,
 and duct insulation, and ceiling panels.



 Materials containing "friable asbestos" in concentrations equal too or greater than 1% must be managed as hazardous waste.



- Friable means; any ACM that may be crumbled, crushed, pulverized or reduced to a powder or similar type debris by hand pressure.
- ACM's containing friable asbestos in concentrations less than 1% may be sent to municipal solid waste landfills for disposal. (Pending landfill approval)



- For demolition & restoration operations, determine the quantity and type of ACM (friable/non-friable) before stating the project and retain the documentation for your records.
- Under CERCLA any person or operation that releases 1 pound or more of friable asbestos into the environment must submit to regulatory reporting requirements within 24 hours.

NOTE: All ACM (friable or non-friable) sent to municipal solid waste landfills must be accompanied by a special waste manifest, lab analysis or self certification (depending on the type of asbestos) and be pre- approved by landfill personnel before the shipment arrives.

HAZARDOUS WASTE GUIDANCE FOR

DUMPSTER & LANDFILL RESTRICTED ITEMS

THE FOLLOWING IS A NON-INCLUSIVE LIST OF ITEMS, MATERIALS OR PRODUCTS THAT ARE PROHIBITED FROM BEING PLACED INTO DUMPSTERS DESTINED FOR LANDFILLS.

- Pesticides, Herbicides and Fertilizers.
- OBA's, EEBD's, Oxygen Candles or igniters.
- PCB contaminated or containing items or products.
- Non-empty containers having Paints, POL's or Adhesives.



- Paint Chips & Paint Contaminated Debris. (unless otherwise specified)
- Cathode Ray Tubes (CRT's).
- Wood that has been Treated, Painted or contains Cresol.
- Oil, POL Contaminated Rags and Debris.
- Asbestos and Asbestos Containing Materials.

- Batteries (Dry Cell, Nickel Cadmium Lead Acid etc...).
- Fluorescent, Mercury Vapor, Metal Halide and similar type lamps or tubes.
- Aerosol Containers



- Abrasive Blast Media and Debris.
- Used Oil Filters/Used Fuel Filters
- Terrazzo contaminated with paint. (pending analytical results)
- Scrap Metal (cuttings, borings, shavings & grindings that meet the definition of hazardous waste).
- Solvent Contaminated Rags & Debris
- Toner Cartridges (non-empty)
- Any wastes, materials or items containing liquids.
- Any item, device or material that is considered hazardous waste or medical waste.

If you have any questions regarding whether the items or materials being placed into dumpsters are authorized for disposal at a solid waste landfill, contact your CNRSW base environmental office or CNRSW Hazardous Waste Program Office.

HAZARDOUS WASTE GUIDANCE FOR TREATED WOOD DISPOSAL

 Treated woods must be analyzed to determine if the wood meets the acceptance criteria to be disposed of as Special Waste or Hazardous Waste.



- Chemically and Pressure treated woods contain the toxic constituent "Chromium Copper Arsenate" in concentrations which may cause the wood to be classified as a hazardous waste.
- Treated woods fall into various sub classifications that include Chemically or Pressure Treated and Cresol Contaminated. This type of wood may be found in Pier Pilings, Railroad Ties, Wooden Crates, Mammal Pens and in some Construction Debris.
- Treated wood that meets the criteria of Special Waste, prior to disposal must be approved by landfill authorities using a Special Waste Disposal Request.

(See Guidance for Special Waste Manifesting)



- Once approval has been granted (3-5 days after the request is received), the Treated Wood can be sent to the landfill using a Special Waste Manifest and solid waste Disposal Coupons obtained from the CNRSW Solid Waste Program Office. Additionally, Special Waste Disposal Request and Special Waste Manifests can be obtained from the CNRSW Hazardous Waste Program Office.
- Saw dust from cutting treated woods that meet hazardous waste criteria will <u>not</u> be accepted at the landfill for disposal and must be managed and disposed of as Hazardous Waste.
- Treated wood, cuttings and trimmings that are not designated as Special Waste or Hazardous Waste (from analytical results) may be disposed of as trash.

NOTE: Notify CNRSW Hazardous Waste Program Office prior to conducting any lab analysis. A waste stream determination may have already been made for your type of Treated Wood.

HAZARDOUS WASTE GUIDANCE FOR RESINS, URETHANES & EPOXY PAINTS

 Liquid, unhardened or uncured resins, twopart epoxy paints and urethane specialty coatings when disposed of, shall be containerized, labeled and otherwise managed as a hazardous waste.



- Resins, epoxy paints and urethanes may be managed as solid waste and placed into the trash, provided that:
 - Resins, urethanes and paints are hardened and fully cured.
 - Are not contaminated or mixed with other hazardous materials or wastes.
 - Do not contain other ingredients that would classify them as hazardous waste.
- Containers holding resins, epoxy paint and urethanes must be managed in-accordance with Guidance for Contaminated Containers.



 Non-hazardous debris (cardboard, rags, tarps, paintbrushes etc.) contaminated with resins, paint or urethane may also be managed as solid waste and placed into the trash when the material becomes completely dry.



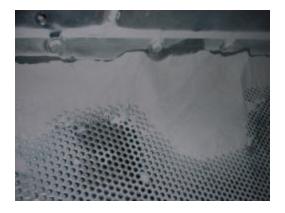
- Resins, epoxy paints and urethanes SHALL NOT be intentionally mixed, spread, blended or otherwise dried for the sole purpose of disposal as solid waste.
- Epoxy paint chips should be managed as a hazardous waste. These paint chips may have absorbed or come in contact with other contaminants or substrates that would cause them to be classified as hazardous.

HAZARDOUS WASTE GUIDANCE FOR ABRASIVE BLAST MEDIA

- Steel shot, aluminum oxide and similar types of abrasive blast grits may be collected, returned to the process, reused and managed as material until the grit becomes unable to be used for it's intended purpose.
- Once blast grit becomes unusable or spent it must be managed as hazardous waste or excluded recycled material.
 - ** (Depending on the grits properties, constituents and ability to be recycled)



 All blast grit emitted from blast rooms or booths (usable or spent) must be immediately collected, containerized and labeled. Any grit not collected and containerized is considered discarded and presumed to be hazardous waste.



 Used blast media collected for reuse in the blasting process shall be labeled "Usable Blast Media", "Blast Media" or in some other manner that identifies the grit as a usable material.



- Spent or otherwise non-useable blast media must be labeled as hazardous waste or excluded recycled material depending how it will be managed.
- Activities using blast grit such as plastic media being recycled at an off-site facility must review the hazardous waste recycling section of the CNRSW Hazardous Waste Management Plan for possible notification requirements for recyclable waste pursuant to the health and safety code.

HAZARDOUS WASTE GUIDANCE FOR HAZARDOUS WASTE AND SPECIAL WASTE MANIFESTING

HAZARDOUS WASTE

 Commands and Activities that transport or have Hazardous Waste transported offbase for storage or disposal must use a properly completed California Uniform Hazardous Waste Manifest.



- If a private contractor is used to transport the hazardous waste and provides the manifest, authorized Shaw Infrastructure, Inc. personnel must sign the manifest as the hazardous waste generator.
- Per CNRSW Hazardous Waste Policy, only authorized Shaw Infrastructure, Inc. personnel may sign a Hazardous Waste Manifest regardless of who provides the manifest or transports the waste.

SPECIAL WASTES



- Commands or Activities that transport or have Special Waste (such as Treated Wood) transported off-base for disposal must use a properly completed Special Waste Manifest.
- Command or Activity personnel may complete and sign a Special Waste Manifest.
- Special Waste Manifest and Disposal Request Forms may be obtained from the CNRSW Hazardous Waste Program Office @ 524-6351 or 533-7525.
- ** For additional information regarding Special Waste Management refer to Section 13.

HAZARDOUS WASTE GUIDANCE FOR MERCURY CONTAINING WASTES

- Mercury is a regulated hazardous substance and when any item or device is discarded, abandoned or no longer is usable which contains mercury or mercury compounds, the mercury then becomes regulated as a hazardous waste.
- Mercury and mercury compounds can be found in major appliance light switches, thermometers, thermostats, dry cell batteries, blood pressure monitoring instruments, fluorescent light tubes and vehicle hood and trunk light switches.



Mercury containing switches must be removed and properly managed before any appliance, vehicle or other item is discarded. If these items are turned in to an authorized recycling center or buy back program the removal of the mercury is not required. The mercury will become the responsibility of the receiving entity.



- All removed switches being discarded and any broken or no longer functioning or usable mercury containing devices in which the mercury or mercury compound cannot be removed shall be managed and disposed of as a hazardous waste if not being recycled.
- Hardened dental amalgam that contains mercury, which is collected for recycling, is considered scrap metal; any <u>discarded</u> hardened amalgam must be managed and disposed of as <u>hazardous waste</u>.



HAZARDOUS WASTE GUIDANCE FOR LOW LEVEL RADIOACTIVE WASTES (LLRW)

- LLRW is any discarded or non-usable item or device that contains a low level radioactive material, such as specifically labeled or marked:
 - Smoke Detectors
 - Combat Systems Electron Tubes
 - Radioactive Calibration Samples
 - Helicopter Counter-Balance Weights
 - Deck Markers
 - Radium Dials
 - Exit Signs



- LLRW shall not be disposed of into the trash. LLRW that has been mixed or contaminated with hazardous waste shall be managed and disposed of as a hazardous waste. Note: Special arrangements will have to be made with a hazardous waste disposal facility authorized to accept Mixed Waste. The Hazardous Waste Facilities do not accept mixed waste.
- Once identified as LLRW (MSDS or Manufacture) the item or device shall be containerized (if possible) and labeled, such as: Exit Signs, Smoke Detectors and so on. Do NOT use hazardous waste or excluded recyclable labels.



- Within two months of accumulation LLRW type items, submit a LLRW disposal request to your respective CNRSW base environmental office. A disposal request can be obtained from the CNRSW Hazardous Waste Program Office by calling 524-6307.
- CNRSW Hazardous Waste Program Office will submit a consolidated list of LLRW from regionalized activities to the RASO for pickup and disposal.

NOTE: Afloat commands are required to contact their respective Logistic Support Representative (LSR) for the removal and disposal of LLRW.

HAZARDOUS WASTE GUIDANCE FOR OILY RAGS & DEBRIS

- Environmental regulations require Oil/POL saturated rags & debris to be managed as hazardous waste unless the items are being recycled, (such as Red Rags) at an authorized recycling facility.
- Non-saturated rags or debris contaminated with Oils/POL may be managed as solid waste and disposed of into the trash.



 Any rags or debris which becomes saturated with or that has absorbed Oils/POL's shall not be disposed of in the trash.



- For the purpose of the guidance only;
 POL's are identified as:
 - Oils (all types)
 - Hydraulic Fluids
 - Greases/Graphite's

- Rags that become saturated with these types of substances must be accumulated in lined containers and emptied daily with the contents taken to a hazardous waste accumulation area for proper management and disposal.
- Rags & debris contaminated with substances other than POL's (such as fuels, pesticides, paints and solvents) must be identified with the specific contaminant and managed separately.
- Additionally, rags & debris contaminated with POL's that contain PCB's or with hazardous waste must be managed as hazardous waste.
- Plastic oil containers may be recycled or may be disposed of into the trash if the container meets the empty container requirements as defined in Guidance for "Contaminated Containers".



 Porous containers that become saturated with Oils/POL must be managed as hazardous waste.

Note: For the purpose of this guidance, if no liquid can be released by hand pressure from oily rags or debris, then it may be managed as trash.

HAZARDOUS WASTE GUIDANCE FOR COMPRESSED GAS CYLINDERS

- Compressed gas cylinders are exempt from hazardous waste requirements when the pressure within the cylinder approaches atmospheric pressure.
- Gas cylinders must not be intentionally punctured, vented or discharged into the environment to avoid regulatory requirements.



 Empty/intact gas cylinders shall not be placed into the trash or scrap metal containers.

NOTE: If the gas cylinder has been cut in half, has the pressure valve removed or can be verified (visibly) that the cylinder is empty, the cylinder may then be managed as scrap metal.

 Per hazardous waste regulations, aerosol containers (such as spray paints, lubricants or dye penetrants) are not compressed gas cylinders.



- With the exception of gas cylinders attached or associated with bar-b-que grills, all cylinders must meet the hazardous material standards of being:
 - Closed when not in use.
 - Labeled with the cylinders contents.
 - Be in good condition and capable of holding the product.



- Pending disposal, gas cylinders shall be managed as hazardous waste or material depending on the final disposition of the cylinder going to Stoody, DRMO or FISC.
- For compressed gas cylinder disposal, regardless of size, contact :

Stoody Industrial and Welding Supplies @ (619) 234-6750

Or

DRMO if the cylinders cannot be accepted by FISC.

HAZARDOUS WASTE GUIDANCE FOR PESTICIDE MANAGEMENT



Definition

- Pesticides are a large classification of chemicals, natural or synthetic, that are intended to control, destroy or repel pests.
- Pests can be defined as anything unwanted, such as; rodents, fungi, weeds and insects.

Certification

 Any person applying pesticides on DoD installations are required to be certified as a "Pesticide Applicator".

Note: The exception is for personnel applying products in work spaces for personal relief and military housing residents applying pesticide for personal use.

Approval and Record Keeping

- All pesticides to be used on DoD installations shall be submitted for approval to the NAVFAC Pest Management Consultant via your respective pest management coordinator.
- Records shall be maintained on all pesticides applied at the facility and submitted to the pest management coordinator.

Container Management

- As with any hazardous materials, pesticides containers must be maintained closed, labeled and in good condition.
- Bags that contained pesticides may be disposed of as trash once all the material has been removed.
- Empty containers that held liquid pesticides may be managed as trash after the container has been triple rinsed.



- Any rinsed material form pesticide containers must be applied in the pest control process and not disposed of into the sewer system, storm drains or discharged onto the ground.
- Aerosol containers holding pesticides may be managed as trash after:
- The container is empty of all its contents and the container is disposed of at the location where the product was applied.

Any pesticide container that in not completely empty when discarded must be managed as a hazardous waste.

For more specific information regarding pest management and certification contact your Pest Management Coordinator or NAVFAC Pest Management Consultant at 523-3942

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HAZARDOUS WASTE GUIDANCE FOR DISCARDED CONSUMER & INDUSTRIAL DEVICES



- A/C Units, compressors, water fountains, various types of electrical equipment, and refrigerators may contain hazardous materials that must be removed prior to disposal or recycling.
- These devices may contain:
 - Oils, Dielectric Fluids
 - Refrigerants
 - Mercury Switches
 - PCB's (older devices)
- Once removed from the device these hazardous materials become classified as relinquished or discarded and must be reused, recycled or managed as a hazardous waste.
- Halons, Freons, CFC's or other refrigerants shall not be intentionally vented into the environment.



Note: It is the responsibility of the owner to incur the cost for having any hazardous material removed from their specific device prior to disposal or recycling.

Once the material is removed and the material will be disposed of as a hazardous waste, then the Environmental Office will incur the disposal cost.

- Unless you can safely remove the hazardous material at your shop, prior to disposal or recycling contact Facilities or PWC Code 500 to have your refrigerant removed or recovered.
- Once all hazardous materials are removed, the device can be discarded, recycled or placed into scrap metal containers.



SECTION 12

HAZARDOUS WASTE ADDENDUM FOR PAINTS AND PAINTED DEBRIS

HAZARDOUS WASTE ADDENDUM FOR PAINTS AND PAINTED DEBRIS

Paints come in a variety of toxicity, from haze gray to anti-foulant to latex each has there own hazardous properties, and management requirements. The following is a general outline of the different grouping of paints and their waste management requirements.

Water-based or more commonly known as latex paints are widely used in architectural applications and are the least toxic group of paints. Notice the term "Least Toxic" and not non-toxic. Some latex paints have fungicides or algaecides as additives to inhibit the growth of these organisms, and may fail the California hazardous waste test for acute aquatic bioassay. Never rinse or pour latex paints onto the ground or into drains or storm drains, however rinsing these types of paints from paintbrushes or painting equipment into the sanitary sewer is acceptable under normal conditions. Pouring latex paint into the deep sink vice usage or proper disposal is prohibited. Additionally, intentionally air drying latex paints for disposal as solid waste (trash) by leaving off the lid is prohibited by environmental law, although dried paintbrushes, tape, tarps or other nonhazardous debris contaminated with dried latex paint may be placed into the trash.

Solvent and oil-based paints. These paints normally have flashpoints that cause them to be classified as ignitable or flammable, and contain heavy metals such as chrome, cadmium, and zinc that are regulated as hazardous waste if specific levels are present. Even when dry these heavy metals still remain within the paints chemical composition. In addition, when these paints are removed from a surface they can absorb or retain contaminants from the removed substrate.

Paint chips require lab analysis to determine their composition and are almost always classified as a hazardous waste.

Also, even non-hazardous debris contaminated with a significant amount (20% or more coverage) of dried paint having heavy metals need to be managed as hazardous waste and not placed into the trash.

Epoxies or other two-part paints are unique, when mixed and in liquid form these paints have higher flashpoints and are not classified as flammable, they do however fail the aquatic bioassay for toxicity and must be managed as a hazardous waste. On the other hand, once dried and fully cured epoxy paints do not normally have any characteristics of toxicity and may be placed into the trash. However, as mentioned above, paint removed from a substrate (including epoxies) may become hazardous. As a best management practice always test your paint/ paint chips before disposal, MSDS do not normally identify ingredients below 1%, and a heavy metals are tested in parts per million and not in percentages. Also, any container, which contains dried epoxy paint, must comply with the requirements of Guidance for Contaminated Containers.

Anti- foulants. These types paints in some cases are pesticide variants and are even registered as pesticides with the USEPA. Antifoulant paints contain ingredients that kill marine organisms and contain the heavy metal copper. Discarded paints, paint chips and all debris from these paints must be managed as hazardous waste.

Remember it is your responsibility as a generator to test your paint and paint debris before disposal and determine the appropriate management technique. If you have questions regarding proper disposal of paints contact your respective base environmental office or CNRSW Hazardous Waste Program office.